

FILED

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FRANCISCO FLORES,

Defendant.

INDICTMENT

CASE NO.

JUDGE GWIN

1:18 CR 679-11

Title 18, Sections 922(d)(1),
924(d)(1), 924(h), 982(a)(1),
1956(a)(3)(B), and 1960,
United States Code; Title 28,
Section 2461(c), United States
Code

COUNT 1

(Transfer of a Firearm for Use in a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(h))

The Grand Jury charges:

1. On or about January 10, 2018, in the Northern District of Ohio, Eastern Division, Defendant FRANCISCO FLORES did knowingly transfer the following firearms, a Smith & Wesson, Model .357 Magnum, .357 caliber revolver, Serial No. AVU0858; a Glock, Model 19, 9mm caliber semiautomatic pistol, Serial No. VEV712; and a Smith & Wesson, Model M&P-15, 5.56mm caliber semiautomatic assault rifle, Serial No. SV05293, knowing that the firearms would be used in a drug trafficking crime, that is, conspiracy to distribute controlled substances in violation of Title 21, United States Code, Section 846, and distributing and possessing with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 924(h).

COUNT 2

(Sale of Firearm or Ammunition to a Convicted Felon, in violation of 18 U.S.C. § 922(d)(1))

The Grand Jury further charges:

2. On or about June 1, 2018, in the Northern District of Ohio, Eastern Division, Defendant FRANCISCO FLORES did knowingly sell and otherwise dispose of the following firearms, a Pietro Beretta, Model 925S, 9mm caliber semiautomatic pistol, Serial No. X25184Z, and a Glock, Model 19, 9mm caliber semiautomatic pistol, Serial No. ZLT213, to Person 1, a person known to the Grand Jury, knowing and having reasonable cause to believe that Person 1 had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

COUNT 3

(Sale of Firearm or Ammunition to a Convicted Felon, in violation of 18 U.S.C. § 922(d)(1))

The Grand Jury further charges:

3. On or about August 31, 2018, in the Northern District of Ohio, Eastern Division, Defendant FRANCISCO FLORES did knowingly sell and otherwise dispose of the following firearms, a Glock, Model 34, 9mm caliber semiautomatic pistol, Serial No. DTG384US, and a Glock, Model 19 Gen 4, 9mm caliber semiautomatic pistol, Serial No. VRW536, to Person 1, a person known to the Grand Jury, knowing and having reasonable cause to believe that Person 1 had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

COUNT 4

(Sale of Firearm or Ammunition to a Convicted Felon, in violation of 18 U.S.C. § 922(d)(1))

The Grand Jury further charges:

4. On or about November 1, 2018, in the Northern District of Ohio, Eastern Division, Defendant FRANCISCO FLORES did knowingly sell and otherwise dispose of the

following firearms, a Diamondback Firearms, Model DB15, 5.56mm caliber semiautomatic assault rifle, Serial No. DB1509198, and a Smith & Wesson, Model SW40F, .40 caliber semiautomatic pistol, Serial No. PAA4891, and ammunition to Person 2, a person known to the Grand Jury, knowing and having reasonable cause to believe that Person 2 had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

COUNT 5

(Money Laundering, in violation of 18 U.S.C. § 1956(a)(3)(B))

The Grand Jury further charges:

5. From on or about August 1, 2017 to on or about August 22, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant FRANCISCO FLORES, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer and by another person at the direction and approval of a Federal official authorized to investigate and prosecute Title 18, United States Code, Section 1956 violations, to be proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances in violation of Title 21, United States Code, Section 846, and distributing and possessing with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 6

(Money Laundering, in violation of 18 U.S.C. § 1956(a)(3)(B))

The Grand Jury further charges:

6. From on or about September 17, 2017 to on or about September 21, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant FRANCISCO FLORES, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer and by another person at the direction and approval of a Federal official authorized to investigate and prosecute Title 18, United States Code, Section 1956 violations, to be proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances in violation of Title 21, United States Code, Section 846, and distributing and possessing with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 7

(Money Laundering, in violation of 18 U.S.C. § 1956(a)(3)(B))

The Grand Jury further charges:

7. From on or about October 24, 2017 to on or about November 8, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant FRANCISCO FLORES, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer and by another person at the direction and

approval of a Federal official authorized to investigate and prosecute Title 18, United States Code, Section 1956 violations, to be proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances in violation of Title 21, United States Code, Section 846, and distributing and possessing with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 8

(Money Laundering, in violation of 18 U.S.C. § 1956(a)(3)(B))

The Grand Jury further charges:

8. From on or about December 19, 2017 to on or about January 10, 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant FRANCISCO FLORES, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer and by another person at the direction and approval of a Federal official authorized to investigate and prosecute Title 18, United States Code, Section 1956 violations, to be proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances in violation of Title 21, United States Code, Section 846, and distributing and possessing with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 9

(Operating Unlicensed Money Transmitting Business, in violation of 18 U.S.C. § 1960)

The Grand Jury further charges:

9. From on or about July 1, 2016 to the Present, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant FRANCISCO FLORES did knowingly conduct, control, manage, supervise, direct, and own an unlicensed money transmitting business affecting interstate and foreign commerce that (1) operated without an appropriate money transmitting license in Ohio, where such operation is punishable as a misdemeanor or felony under state law; (2) failed to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, and the regulations thereunder; and (3) involved the transportation and transmission of funds that were known to Defendant to have been derived from a criminal offense and were intended to be used to promote and support unlawful activity, to wit: FLORES utilized his business FLORES FLOORING and its associated assets to engage in unlicensed money transmitting, in violation of Title 18, United States Code, Sections 1960(b)(1)(A), (B), and (C).

FORFEITURE

The Grand Jury further charges:

10. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), Title 18, United States Code, Section 982(a)(1), and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 through 9 of this indictment are incorporated herein by reference. As a result of the foregoing, Defendant FRANCISCO FLORES shall forfeit to the United States any property, real or personal, involved in Counts 1-5 and any property

traceable to such property; and, any and all property (including firearms and ammunition) involved in or used in the commission of Counts 6-9.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.